1	HEATHER M. FREINKEL, SBN 272931			
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3	Oakland, CA 94612			
4	Phone: (510) 695-2260 x. 322 Fax: (510) 540-0403			
4	hfreinkel@homelessactioncenter.org			
5	Attorney for Plaintiff			
6				
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8				
9	UNITED STATES DISTRICT COURT			
10	NORTHERN DISTRICT OF CALIFORNIA			
11				
12	LAMIDAVEN IONEC	CIVIL NO. CIVIL NO. 3:16-cv-03766-LB		
13	JAMI RAVEN-JONES,	CIVILINO. CIVILINO. 3.10 CV 03700 LB		
	Plaintiff,	STIPULATION AND PROPOSED ORDER		
14	v.	FOR A FIRST EXTENSION FOR		
15	NANCY A. BERRYHILL,	PLAINTIFF TO FILE REPLY TO DEFENDANT'S CROSS MOTION FOR		
16		SUMMARY JUDGMENT		
17	Acting Commissioner of Social Security, ¹			
18				
19	Defendant.			
20				
21				
22	IT IS HERERY STIPLU ATED, by and b	etween the parties through their respective		
23	IT IS HEREBY STIPULATED, by and between the parties, through their respective			
24	counsel of record, that Plaintiff shall have a first extension of time of twenty-one days to file her			
25				
26	Nancy A. Berrynill is now the Acting Commissioner of Social Security. Pursuant to Rule 25(d)			
27	of the Federal Rules of Civil Procedure, Nancy A. Berryhill should be substituted for Acting Commissioner Carolyn W. Colvin as the defendant in this suit. No further action needs to be			
28				
	Action, 42 U.S.C. §405(g)."			

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1	reply to Defendant's motion for summary judgment. The current due date is February 27, 2017		
2	The new due date will be March 20, 2017.		
3	This is the first continuance sought by Plaintiff. There is good cause for this request.		
4	Plaintiff seeks this extension due to counsel's heavy workload, including her administrative		
5	hearing caseload with the Social Security Administration.		
6	Plaintiff apologizes for any inconvenience caused by this delay. Defendant does not		
7	object and agrees that all subsequent filing deadlines should be extended accordingly.		
8			
9			
10	Dated this 21st Day of February, 2017	Respectfully Submitted,	
11			
12	Dated: February 21, 2017	_/s/ Heather M. Freinkel	
13 14		HEATHER M. FREINKEL Attorney for JAMI RAVEN-JONES HOMELESS ACTION CENTER	
15		2601 San Pablo Ave. Oakland, CA 94612	
16			
17	Dated: February 21, 2017	_/s/ Beatrice Na *	
18		BEATRICE NA	
19		Attorney for NANCY A. BERRYHILL (*Authorized via email on 2/21/17)	
20		160 Spear Street, Suite 800 San Francisco, CA 94105	
21		San Francisco, CA 74103	
22			
23	PURSUANT TO THE ABOVE STIPUL	ATION, IT IS SO ORDERED:	
24			
25	Dated: 2/23/2017		
2627		THE HONORABLE LAUREL BEELER	
		United States Magistrate Judge	
28			